



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, NY 10007*

July 13, 2021

BY ECF

MEMORANDUM ENDORSEMENT

Hon. Kevin Nathaniel Fox
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Camacho v. Comm'r of Soc. Sec.*, No. 20 Civ. 8304 (KPF) (KNF)

Dear Judge Fox:

This Office represents the Commissioner of Social Security (the “Commissioner”), the defendant in the above-referenced action brought pursuant to 42 U.S.C. § 405(g), in which the plaintiff seeks judicial review of the Commissioner’s decision to deny his application for Social Security disability benefits.

In advance of the status conference set by Your Honor’s Order of July 7, 2021, I respectfully write to update Your Honor on the status of this matter and to respectfully request an extension of time for the Commissioner to file a motion for judgment on the pleadings from June 23, 2021, until July 19, 2021, *nunc pro tunc*. I apologize for the delay in requesting this extension and providing the Court with an update in this case, but a final extension of time would allow completion of the Commissioner’s internal review of the issues presented in this case in order to determine the Commissioner’s litigation position. This process of internal review has taken longer than originally expected but should be completed by Friday, July 16, 2021. I am very sorry for the delay, but a final extension would promote judicial efficiency by potentially avoiding unnecessary motion practice if the parties are able to resolve this action through stipulation.

The plaintiff consents to this request for an extension. This is the Commissioner’s second request for an extension of the time to file a motion for judgment on the pleadings. The Court previously granted the Commissioner two extensions of time to file the certified administrative record (Dkt. Nos. 11, 14), and granted the Commissioner a 16-day extension of time to file a motion for judgment on the pleadings (Dkt. No. 17). I apologize again to the Court and the plaintiff for the delay in this action.

I thank the Court for its consideration of this request.

Respectfully,

AUDREY STRAUSS
United States Attorney

/s/ Amanda F. Parsels

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cc: Luis Camacho (by mail)
Plaintiff Pro Se

7/14/21

Application granted. The defendant shall serve the plaintiff with a copy of this Memorandum Endorsement and file proof of service with the Clerk of Court.

SO ORDERED:

Kevin Nathaniel Fox

Kevin Nathaniel Fox, U.S.M.J.